



U.S. Department of Justice

United States Attorney  
Southern District of New York

MEMO ENDORSE

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

May 18, 2021

5/18/2021  
modified  
authorized

**BY ECF**

Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: United States v. Laforest et al., 21 Cr. 272 (CM)**

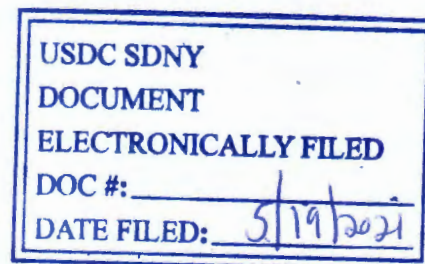
Dear Judge McMahon:

The Government respectfully submits this letter to request: (1) a technical modification to the bail conditions for defendants Tatiana Laforest and Sanjay Laforest; and (2) a substantive modification to the bond for Sanjay Laforest. First, the technical modification: The defendants' bonds each state that location monitoring equipment should prevent the defendants from entering areas near airports. Pretrial Services has requested that the Court clarify this condition by specifically ordering that the defendants are prohibited from entering areas near airports.

Pretrial Services has explained to the Government that *equipment* cannot prevent the defendants from entering a location. The Court, however, can prohibit the *defendants* from entering a location, and Pretrial Services will enforce that prohibition through location monitoring, which will alert Pretrial Services if they violate the condition.

The defendants consent to this modification. This modification is not necessary for defendants Sabitri Laforest and Garry Laforest; their bonds correctly prohibit the defendants themselves from entering airports without prior authorization.

Second, the substantive modification. Counsel for Sanjay Laforest has represented to the Government that, in light of the Government's execution of a forfeiture warrant seizing a significant amount of cash and securities, Sanjay Laforest no longer has sufficient assets to satisfy the collateralized portion of his bond. Unlike his three co-defendants, Sanjay Laforest does not own real property he can potentially pledge to the secure the bond. Accordingly, the Government consents to Sanjay Laforest's request to forego the \$100,000 collateral as a requirement of his bond. In turn, however, Sanjay Laforest has agreed that the unsecured portion of the bond that must be signed by himself and cosigned by three financial responsible people will be raised from \$1 million to \$1.5 million.



The Government respectfully requests that the Court so order these modifications to the defendants' bail conditions.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

by: /s/ Matthew R. Shahabian  
Matthew R. Shahabian  
Assistant United States Attorney  
(212) 637-1046

CC: Counsel of Record (by ECF)